

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

-against-

RICHARD SCHUELER aka RICHARD
HEART, HEX, PULSECHAIN, and
PULSEX,

Defendants.

Civil Action No. 1:23-cv-05749-CBA-PK

**DECLARATION IN SUPPORT OF
MOTION TO ADMIT COUNSEL
*PRO HAC VICE***

I, MICHAEL E. LIFTIK, declare pursuant to 28 U.S.C. § 1746 that:

1. I am a partner with the law firm of Quinn Emanuel Urquhart & Sullivan, LLP, counsel for Defendant Richard Schueler aka Richard Heart in the above-captioned action.
2. I submit this declaration in support of my motion to practice *pro hac vice* in the above-captioned action.
3. As shown in the Certificates of Good Standing annexed hereto as **Exhibit A**, which have been issued within the past 30 days, I am a member in good standing of the Bars of the District of Columbia, the State of California, and the Commonwealth of Massachusetts.
4. I have no disciplinary proceedings pending against me in any federal or state court.
5. I have never been convicted of a felony.
6. I have never been censured, suspended, disbarred, or denied admission or readmission by any court.
7. I am familiar with the standards of professional conduct imposed on members of the New York bar, including the rules governing the conduct of attorneys and the New York Rules

of Professional Conduct. I will abide by those standards in the representation of Defendant Richard Schueler aka Richard Heart in this case.

WHEREFORE, I respectfully request that the Court grant this motion for my admission *pro hac vice* in the above-captioned action.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 16th day of January, 2024, in the District of Columbia.

/s/ Michael E. Liftik
Michael E. Liftik